REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-4, 7, 8, and 10 have been amended to more clearly recite the invention. No new matter has been added. Claims 1-19 are pending.

Rejection of claims 1 and 5 under 35 U.S.C. 102(b)

Claims 1 and 5 were rejected under 35 U.S.C. 102(b) for allegedly being anticipated by Hiroya et al. (U.S. Patent Number 5,084,416) or by Boucher et al. (U.S. Patent No. 5,884,246). Applicants respectfully traverse these rejections.

Claim 1, as amended, recites selecting a portion of the data to be translated (the data string) and translating the at least one data string. Hiroya fails to teach or suggest selecting a portion of the data to be translated. Hiroya merely discloses translating data in its entirety into an intermediate form, then translating the intermediate form in its entirety into a second language (See Hiroya, col. 7, line 63 – col. 8, line 31 and Figs. 1, and 3-7).

Claim 1, as amended, further recites a storage memory for storing the at least one data string and corresponding translated at least one data string. Both Hiroya and Boucher fail to teach or suggest a storage memory for storing the at least one data string and corresponding translated at least one data string. Both Hiroya and Boucher merely translate input data and send the translated data to a client/hosting machine. Nor would Hiroya or Boucher have any reason to store selected data strings from the data and

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corresponding translated data strings because both Hiroya and Boucher merely translate the input data and forward the data. Storing is unnecessary in both systems.

Therefore, for at least the reasons set forth above, it is respectfully submitted that the rejection of claims 1 and 5 should be withdrawn.

Rejection of claims 2 and 7 under 35 U.S.C. 103(a)

Claims 2 and 7 were rejected under 35 U.S.C. 103(a) as being obvious over Hiroya. This rejection is respectfully traversed.

The Office Action asserts that a storage memory would have been obvious because "the information would need to be buffered ... in memory for processing."

Claims 2 and 7 depend from claim 1. Claim 1, as amended, recites selecting a portion of the data to be translated (data string) and storing the data string and corresponding translated data string. Even assuming *arguendo* that the information to be translated "would need to be buffered ... in memory for processing" as the Office Action asserts, there is no motivation to store the data string and the corresponding translated data string. Also, as stated above, Hiroya fails to teach or suggest selecting the data string and translating the data string. Hiroya also fails to teach or suggest transmitting the data to be translated and the translated at least one data string to the translation source for completing translation of the data. Hiroya merely discloses translating a document in its entirety from a first language to an intermediate form, then translating the intermediate form in its entirety to a second language.

Also, claim 7, as amended, recites transmitting an e-mail message to identify a network link to an address from which the translation can be downloaded. Hiroya fails to

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teach or suggest transmitting such an e-mail. The Office Action misinterprets the claim language as reciting transmitting "the partially translated message to the translation source through e-mail" (see Office Action, page 4) and concludes that transmitting a partially translated message via e-mail would be an obvious "design choice." However, claim 7 does not recite transmitting the partially translated message through e-mail. Rather, claim 7 recites transmitting an e-mail to identify a network link to an address from which a translation can be downloaded. Clearly, Hiroya fails to teach or suggest this feature. Nor does the Office Action assert that Hiroya does teach or suggest this feature.

Therefore, at least for the above reasons, it is respectfully submitted that the rejection of claims 2 and 7 should be withdrawn.

Rejection of claims 3, 4, 6, 8, 9 under 35 U.S.C. 103(a)

Claims 3, 4, 6, 8, and 9 were rejected under 35 U.S.C. 103(a) as being obvious over Hiroya in view of Nishino (U.S. Patent No. 5.295,068). This rejection is respectfully traversed.

Claims 3, 4, 6, 8, and 9 depend from claim 1. As set forth above, Hiroya fails to teach or suggest claim 1. Nishino, alone or in combination with Hiroya, also fails to teach or suggest claims 1, 3, 4, 6, 8 or 9.

Claim 1, as amended, recites selecting a portion of the data to be translated (data string) and transmitting the data to be translated and the translated data string to a translation source for completing translation of the data. Hiroya fails to teach or suggest selecting a portion of the data to be translated or transmitting the data to be translated and the translated data string. Rather, Hiroya translates a document from a first language into

an intermediate form and into a second language in its entirety. Nishino fails to cure the deficiencies of Hiroya. Nishino also translates a document in its entirety into a second language (See Fig. 1, for example, where the translation means 6 translates the document in its entirety - including "private-use words" - and sends the completed translation to the user via the electronic-mail transmitting unit 5). Nishino also fails to teach or suggest selecting a potion of the data to be translated or transmitting the data to be translated and the translated data string.

The Office Action asserts that the "standard dictionary 7" of Nishino provides "storage for use in translation" and stores "previously translated data". Based on this assertion, the Office Action concludes that it would have been obvious to "include previously translated data in storage for use in translation because it would allow for standard translation techniques." See Office Action, page 4. However, Nishino fails to teach or suggest that the "standard dictionary 7" stores previously translated data as the Office Action asserts. Nishino fails to disclose what information is contained in the standard dictionary 7 or how the information is derived. Thus, one of ordinary skill in the art given the Nishino disclosure would merely understand the standard dictionary 7 to contain words and their corresponding meanings (or equivalents in other languages) as a "standard" dictionary would provide. Nevertheless, Nishino fails to teach or suggest, nor would one of ordinary skill in the art conclude from the Nishino disclosure that Nishino stores at least one data string and the corresponding translated data string in the "standard dictionary 7". Indeed, the one-way arrow pointing away from the standard dictionary 7 as depicted in Fig. 1 of Nishino strongly suggests that the system does not input data into the standard dictionary 7 at all.

Claim 6 is allowable for at least the reasons set forth above for claim 1. Claim 6 further recites transmitting an e-mail message to the source of data identifying a network link to an address from which the completed translation can be downloaded. The Office Action asserts that Nishino discloses transmitting an e-mail message with the completed translation (col. 4, lines 32-42) but misinterprets claim 6 to conclude that Nishino discloses claim 6. Nishino at col. 4, lines 32-42 discloses an electronic-mail transmitting unit 5 that sends an e-mail to designated users containing the translation. However, as set forth above, claim 6 does not recite transmitting an e-mail message containing the translation as the Office Action has construed. Rather, claim 6 recites transmitting an e-mail message identifying a network link to an address from which the completed translation can be downloaded. Nishino fails to teach or suggest a network link or an address from which the completed translation can be downloaded, or even that the translation can be downloaded at all. Nor does the Office Assert that Nishino provides such a teaching or suggestion.

Therefore, for at least the reasons set forth above, it is respectfully submitted that the rejection of claims 3, 4, 6, 8, and 9 should be withdrawn.

Rejection of claim 19 under 35 U.S.C. 103(a)

Claim 19 was rejected under 35 U.S.C. 103(a) as being obvious over Hiroya in view of Nishino. This rejection is respectfully traversed.

Claim 19 recites many features of the present invention. The Office Action merely asserts that claim 19 is supposedly obvious over Hiroya in view of Nishino but fails to provide a rationale for the applied rejection.

For example, claim 19 recites a file storage memory coupled to a first computer for storing user related current document data, a second computer coupled to the first computer and the file storage memory for at least partially translating the current document data, a database of previously entered document data and associated translated document data coupled to the second computer, the second computer comparing the current document data with the previously entered document data to match the current document data with corresponding translated document data in the database to form the at least partial translation of the current document data, sending the at least partial translation to the first computer and transmitting therefrom to the at least one vendor terminal for completing translation of the current document data and uploading the completed translation to the first computer, the first computer including means for transmitting said completed translation to the at least one user terminal and the second computer, the second computer including means for adding the current document data and the completed translation to the database.

Neither Hiroya nor Nishino, either alone or in combination teaches or suggest these features. Therefore, it is respectfully requested that the rejection of claim 19 be withdrawn.

Rejection of claim 10 under 35 U.S.C. 103(a)

Claim 10 was rejected under 35 U.S.C. 103(a) as being unpatentable over Hiroya in view of Nishino and further in view of Carlin.

As set forth above, neither Hiroya nor Nishino, either alone or in combination, teach or suggest claim 1. Claim 10 depends from claim 1. Carlin fails to cure the deficiencies of Hiroya and/or Nishino.

Claim 1, as amended, recites selecting a portion of the data to be translated (data string) and transmitting the data to be translated and the translated data string to a translation source for completing translation of the data. Claim 1 also recites storing the data string and the corresponding translated at least one data string. Carlin, like Hiroya and Nishino, fails to teach or suggest any of these features. Nor does the Office Action assert that Carlin does teach any of these features. Therefore, the rejection should be withdrawn.

Claim 10 recites identifying and extracting redundant strings in the data to be translated for translation separate from other strings therein. The Office Action cites Carlin as providing "an interpretive text system that extracts redundant character strings." See Office Action, page 6. However, Carlin discloses a system for providing information on a stock or security. In Carlin, data is examined for a particular security and information on the security is retrieved from a fixed disk. Undesirable information, e.g., redundant information, is eliminated. However, Carlin fails to teach identifying and extracting redundant strings in data to be translated for translation separate from other strings therein as recited in claim 10. Indeed, Carlin does not translate any data at all. Thus, there would be no motivation to combine the disclosure of Carlin with that of Hiroya and/or Nishino. Neither Hiroya, Nishino, nor Carlin, either alone or in combination, teach or suggest claim 10.

For at least the reasons set forth above, it is respectfully requested that the rejection of claim 10 be withdrawn.

Rejection of claims 11, 13, 16, and 18 under 35 U.S.C. 103(a)

Claims 11, 13, 16, and 18 were rejected under 35 U.S.C. 103(a) as being unpatentable over Boucher in view of Brown. This rejection is respectfully traversed.

Claim 11 recites, for example, means for collecting translation costs from said plurality of translation sources, means for facilitating the user's selection of at least one of said plurality of translation sources and means for transmitting said at least partially translated data to said selected translation source for completing translation of said data.

Boucher fails to teach or suggest these features. Boucher merely discloses a system for translating data from a first language to a second language where a translation site (i.e., "translationsite.com" 104) translates the data from a first machine 100 and sends the translated data to a hosting machine 108 (see Fig. 2A, for example). However, Boucher fails to teach or suggest a plurality of translation sources or means for facilitating the user's selection of at least one of said plurality of translation sources and means for transmitting said at least partially translated data to said selected translation source for completing translation of said data. Indeed, the "user" in Boucher does not choose among several translation sources at all. Nor does the host computer 108 of Boucher complete translation of the data (translationsite.com 104 of Boucher completes the translation prior to transmitting the translated data to the hosting machine 108 – see Fig. 2A, col. 8, line 52 – col. 9, line 37).

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As the Office Action admits, Boucher fails to teach or suggest collecting translation costs from the plurality of translation sources. However, Brown fails to cure the deficiencies of Boucher.

The Office Action asserts that Brown discloses a "natural translation system that creates multiple translations; each translation is given a cost (score, col. 3, lines 2-11) and then displayed for the user (col. 3, lines 16-18)." However, contrary to the Office Action's assertions, Brown fails to provide such a teaching.

Brown at col. 3, lines 2-11 discloses estimating a first "score" that is proportional to the probability of occurrence of a "target-structure" of text associated with the target hypothesis. Also, a second "score" is disclosed that is proportional to the probability that the intermediate "target-structure" of text will translate into the intermediate "source-structure" of text. Hence, the "score" of Brown as cited by the Office Action refers to a probability of the occurrence of a particular structure of text or the probability that the structure will actually translate into the target text. Clearly, this is unrelated to costs. It is unclear how the Office Action has equated the concept of "translation costs" with the probability "score" of Brown. The Office Action merely asserts that these two different concepts are the same but provides no convincing reasons to support this contention.

In addition, Brown fails to teach or disclose "collecting translation costs from the plurality of translation sources" anywhere in the reference. Therefore, Boucher and Brown, either alone or in combination, fails to teach or suggest claim 11.

For at least these reasons, it is respectfully submitted that the rejection of claim 11 and dependent claims 13, 16, and 18 should be withdrawn.

Rejection of claim 12 under 35 U.S.C. 103(a)

Claim 12 was rejected under 35 U.S.C. 103(a) as being unpatentable over Boucher in view of Brown and further in view of Redpath (U.S. Patent No. 6,347,316). This rejection is respectfully traversed.

Claim 12 depends from claim 11. As set forth above, Boucher fails to teach or suggest claim 11. Redpath fails to cure the deficiencies of Boucher.

For example, claims 11 and 12 recite means for collecting translation costs from the plurality of translation sources. As set forth above, Boucher fails to disclose costs at all. Brown merely discloses a "score" for describing the probability that an intermediate structure of text will occur and another "score" for describing the probability that an intermediate structure will translate into a target text. However, Brown fails to teach or suggest a means for collecting translation costs.

Redpath fails to make up for the deficiencies of Boucher and/or Brown. Redpath also fails to teach or suggest a means for collecting translation costs from a plurality of translation sources. Rather, Redpath merely discloses a human translator to intervene in a machine translation process to create a "perfect file" to be saved on the server (col. 6, lines 32-39). Clearly, this disclosure has nothing to do with collecting translation costs from a plurality of translation sources.

For at least these reasons, it is respectfully submitted that the rejection of claim 12 should be withdrawn.

Rejection of claims 14, 15, and 17 under 35 U.S.C. 103(a)

Claims 14, 15 and 17 were rejected under 35 U.S.C. 103(a) as being unpatentable over Boucher in view of Brown and further in view of Nishino. This rejection is respectfully traversed.

Claims 14, 15 and 17 depend from claim 11. As set forth above, Boucher and Brown, either alone or in combination, fail to teach or suggest claim 11. Therefore, Boucher and Brown, either alone or in combination, also fails to teach or suggest dependent claims 14, 15, and 17. Nishino fails to cure the deficiencies of Boucher and/or Brown.

For example, claims 11, 14, 15 and 17 recite means for collecting translation costs from the plurality of translation sources. As set forth above, Boucher and Brown, either alone or in combination, fails to teach or suggest costs at all.
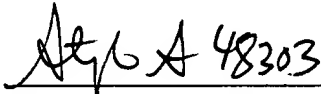
Nishino fails to make up for the deficiencies of Boucher. Nishino, like Boucher or Brown, also fails to teach or suggest a means for collecting translation costs from a plurality of translation sources. Indeed, Nishino fails to teach or suggest costs at all. Thus, Boucher, Brown, and Nishino, either alone or in combination, fail to provide the required motivation to one of ordinary skill in the art to collect translation costs from a plurality of translation sources and facilitate the user's selection of at least one of the plurality of translation sources with a reasonable expectation of success.

For at least these reasons, it is respectfully submitted that the rejection of claims 14, 15, and 17 should be withdrawn.

Applicants respectfully submit that the instant application is in condition for allowance. If the Examiner feels, however, that further amendment and/or discussion

may be helpful in facilitating prosecution of the case, the Examiner is respectfully

requested to telephone the undersigned attorney of record at the number appearing below.

Respectfully submitted,

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